

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**TQ DELTA, LLC,
Plaintiff,**

V.

**COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,**

JURY TRIAL DEMANDED

**Civil Action 2:21-cv-310-JRG
(Lead Case)**

**UNOPPOSED MOTION BY PLAINTIFF TQ DELTA, LLC'S
FOR SUBSTITUTION OF LEAD COUNSEL**

Plaintiff TQ Delta, LLC (“TQ Delta”) files this unopposed motion to request that Peter J. McAndrew of McAndrews, Held & Malloy, Ltd., be substituted as lead counsel for TQ Delta in place of William E. Davis of The Davis Firm, PC.

TQ Delta will continue to be represented in the above-captioned case by Bruster PLLC (specifically, Anthony K. Bruster, Edward K. Chin, Andrew J. Wright, and Shawn A. Latchford; collectively “Bruster PLLC”) and The Davis Firm, PC (specifically, William E. Davis, Christian J. Hurt, Rudy Fink, and Ty Wilson; collectively, “Davis Firm”). It is currently anticipated, however, that the Davis Firm will move to withdraw as counsel of record for TQ Delta after the Court rules on this motion.

TQ Delta has conferred with Defendants' counsel of record in this action, who do not oppose the relief requested in this motion.

Therefore, TQ Delta respectfully requests that the Court substitute Peter J. McAndrews of McAndrews, Held & Malloy, Ltd., as lead counsel for TQ Delta in the above-captioned case.

Dated: May 25, 2023

Respectfully submitted,

By: /s/ Peter J. McAndrews

Peter J. McAndrews
(Pro hac vice)
pmcandrews@mcandrews-ip.com

Rajendra A. Chiplunkar
(Pro hac vice)
rchiplunkar@mcandrews-ip.com

David Z. Petty
(Pro hac vice)
dpetty@mcandrews-ip.com

Ashley Ratycz
(Pro hac vice)
aratycz@mcandrews-ip.com

**MCANDREWS, HELD & MALLOY,
LTD.**
500 West Madison St., 34th Floor
Chicago, IL 60661
Telephone: (312) 775-8000
Facsimile: (312) 775-8100

Edward K. Chin
ed@brusterllc.com
Texas Bar No. 50511688

Anthony K. Bruster
akbruster@brusterllc.com
Texas Bar No. 24036280

Andrew J. Wright
andrew@brusterllc.com
Texas Bar No. 24063927

Shawn A. Latchford
shawn@brusterllc.com
Texas Bar No. 24066603

BRUSTER PLLC
680 N. Carroll Ave., Suite 110
Southlake, TX 76092
(817) 601-9564 – Telephone

William E. Davis, III
Texas State Bar No. 24047416
bdavis@davisfirm.com

Christian J. Hurt
Texas State Bar No. 24059987
churt@davisfirm.com

Rudolph “Rudy” Fink IV
Texas State Bar No. 24082997
rfink@davisfirm.com

Ty Wilson
Texas State Bar No. 24106583
twilson@davisfirm.com

THE DAVIS FIRM PC
213 N. Fredonia Street, Suite 230
Longview, Texas 75601
Telephone: (903) 230-9090
Facsimile: (903) 230-9661

ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules-7(h) and (i), I hereby certify that I conferred with counsel of record on May 22 and May 24, 2023, regarding the subject of this Motion. There was no opposition to the above motion.

/s/ Peter J. McAndrews
Peter J. McAndrews

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this May 25, 2023, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ Peter J. McAndrews
Peter J. McAndrews